



**TCF Submission to**

**The Commerce Commission**

**On Review of the Local and Cellular Telephone Number Portability Services: Draft decision on whether to commence an investigation under clause 1(3) of Schedule 3 of the Telecommunications Act 2001**

**[ 20 August 2025 ]**

**A. Introduction**

1. Thank you for the opportunity to comment on the draft decision on the existence of reasonable grounds to commence an investigation under clause 1(3) of Schedule 3 of the Telecommunications Act 2001 (the Act), on whether Local and Cellular Telephone Number Portability (LMNP) services should be omitted from Schedule 1 of the Act.
2. This submission is provided by the New Zealand Telecommunications Forum (TCF). The TCF is the telecommunications sector's industry body which plays a vital role in bringing together the telecommunications industry and key stakeholders to resolve regulatory, technical and policy issues for the benefit of the sector and consumers. TCF member companies represent 95 percent of New Zealand telecommunications customers. Our members include network operators, retail service providers and the tower companies that own and operate cell towers.
3. The TCF operates the Industry Portability Management System (IPMS), which handles the port request process, including validation and authorisation, for LMNP. There are currently more than 40 providers that interact with the IPMS system daily. The TCF is also responsible for the supporting operations manual to the Number Portability Determination.

**B. Draft decision on whether to commence an investigation under clause 1(3) of Schedule 3 of the Telecommunications Act 2001**

4. The TCF considers that the Number Portability service continues to work well, meeting the needs of the industry and consumers and promoting competition for retail telecommunications fixed and mobile services.
5. The TCF supports the Commission's draft decision that there are no reasonable grounds for commencing an investigation into whether LMNP should be omitted from Schedule 1 of the Act.
6. However, some changes are required to ensure that the regulations remain fit for purpose. We therefore recommend that a review of the Number Portability Determination (including the LMNP Terms and Network Terms) is initiated and completed before the Determination expires on 19 December 2026. The TCF will be in contact with the Commission to confirm the process for this.
7. The TCF is happy to answer any questions the Commerce Commission might have on the views set out in this submission. Please contact Nina Matthews in the first instance:  
[REDACTED]